



Jefferson County Communications Center Authority

433 S. Allison Pkwy, Lakewood, CO 80226 303-989-3968 (ofc)

November 11, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte*, PS Docket No. 07-114

Dear Ms. Dortch,

I am the Executive Director of the Jefferson County Communications Center Authority (Jeffcom911), located in the Denver Metro area. I would like to express concern regarding the FCC's position that z-axis will provide the best information to 9-1-1 professionals who require *actionable* location information to effectively dispatch first responders inside buildings.

Jeffcom911 provides emergency communications for 24 separate agencies, serves a community of 600,000 residents, and processes 240,000 9-1-1 calls per year, with approximately 85% originating from cell phones.

Location information must be actionable, meaning that Public Safety Telecommunicators can quickly use it to assist the caller and direct responders to the scene. However, if wireless carriers are unable to provide a dispatchable location, and instead provide z-axis information, they should be required to make that information as actionable as possible by including an estimated floor number.

Raw vertical estimates without such clarifying data are of little operational value, be it in terms of 'height above ellipsoid' (HAE), 'above mean sea level' (AMSL), or 'above ground level' (AGL). Emergency communications centers like Jeffcom911 do not have the resources to create and maintain indoor maps for buildings in our jurisdictions and do not have the ability to translate HAE to a floor number.

In order for 9-1-1 professionals to have the information they need to ensure that responders arrive as quickly as possible, carriers should at least provide a floor number estimate rather than an approximate measurement in meters that is inaccurate enough (+/- 3 meters) to cause delays when seconds matter. Accordingly, as you contemplate rules for a z-axis metric, please consider requiring wireless carriers to provide a floor number as part of the z-axis information to assist our dedicated telecommunicators provide the best possible service to our first responder agencies and the community we serve.

Sincerely,

Jeff Streeter
Executive Director
Jefferson County Communications Center Authority